

**CHARGE OF DISCRIMINATION
DONALD EDWARDS
PAGE 1**

I. Overview of Individual and Class Allegations

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white applicants and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

II. Statement of Personal Harm

I applied to do general labor at the AK Steel plant in Middletown, Ohio in January 2002. It was approximately the seventh time I had applied. I found out that AK Steel was hiring from the ads they ran in the paper and on cable TV. My work experience consists of doing manual labor, such as mowing the fields along the sides of Ohio highways, for the Ohio Department of Transportation (ODOT). I have also worked for twelve years at the Fairfield Center for Mental Retardation as a medical supply clerk delivering supplies to the different facilities there. In addition, I have a high school diploma. I filled out an application at Palmer Temp, an organization that handles hiring for AK Steel, and never heard back from either them or AK Steel. In previous applications, such as one in August 2001, I took an aptitude test and was interviewed by a white male Palmer Temp representative. The AK Steel exam included easy questions on simple math, common sense (such as, which weighs more: 500 lbs. of water or 500 lbs. of steel? Obviously they weigh the same), and basic questions on weights and measures. The interviewer asked similar questions. At that time, the Palmer Temp representative told me that they would send my application in to AK Steel and I would be called regardless of whether they wanted to hire me or not. I never heard anything back from them in August 2001, though; and I never heard anything back from them when I reapplied in January 2002. I am currently employed by ODOT, for whom I have been doing manual labor for approximately one month.

III. Statement of Discrimination

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

**CHARGE OF DISCRIMINATION
DONALD EDWARDS
PAGE 2**

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

IV. Statement of Classwide Discrimination on the Basis of Race

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), et seq.

I believe this policy has effected a class of African-American persons comprised of all past, present and future African-American applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment.

I declare under penalty of perjury that the foregoing is true and correct.

Date: x 6/28/02

*Donald Edwards

Charging Party (signature)